

**MINOR SOURCE OPERATING PERMIT
INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**Inland Paperboard and Packaging, Inc.
2135 Stout Field
Indianapolis, Indiana 46202**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-14600-00314	
Issued by: ORIGINALLY SIGNED BY John B. Chavez, Administrator Office of Environmental Services City of Indianapolis	Issuance Date: September 26, 2003 Expiration Date: September 26, 2008

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary paperboard production plant.

Authorized Individual: Rick Wheeler
Source Address: 2135 Stout Field, Indianapolis, Indiana 46202
Mailing Address: 2135 Stout Field, Indianapolis, Indiana 46202
General Source Phone: (317) 3903364
SIC Code: 2653
County Location: Marion
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) paperboard corrugation operation, identified as 001, installed in 1989, with a maximum capacity of seven hundred (700) feet per minute, using a cyclone, identified as 014, to collect trim paper, and exhausting to stack 002.
- (b) One (1) six (6) color flexographic printing press, identified as 002, installed in 1996, with a maximum operating capacity of 8,000 sheets per hour, and exhausting to the atmosphere.
- (c) One (1) two (2) color flexographic printing press, identified as 003, installed in 1989, with a maximum operating capacity of 14,000 sheets per hour, and exhausting to the atmosphere.
- (d) One (1) two (2) color rotary die cutter, identified as 004, installed in 1989, with a maximum operating capacity of 8,000 sheets per hour, using a cyclone, identified as 015, to collect trim paper, and exhausting to stack 003.
- (e) One (1) two (2) color rotary die cutter, identified as 005, installed in 1991, with a maximum operating capacity of 8,000 sheets per hour, using a cyclone, identified as 015, to collect trim paper, and exhausting to stack 003.
- (f) One (1) two (2) color rotary die cutter, identified as 006, installed in 1989, with a maximum operating capacity of 6,000 sheets per hour, using a cyclone, identified as 015, to collect trim paper, and exhausting to stack 003.
- (g) One (1) four (4) color rotary die cutter, identified as 007, installed in 2001, with a maximum operating capacity of 10,800 sheets per hour, using a cyclone, identified as 015, to collect trim paper, and exhausting to stack 003.
- (h) Two (2) platen die cutters, identified as 008 and 009, installed in 1994 and 2000, respectively, each with a maximum operating capacity of 10,800 sheets per hour, using a

cyclone, identified as 015, to collect trim paper, and exhausting to stack 003.

- (i) Four (4) specialty folder gluers, identified as 010, 011, 012, and 013, installed in 1989, 1998, 1994, and 2001, respectively, with a collective maximum glue usage of 34.25 pounds per hour, using no controls, and exhausting to the atmosphere.
- (j) One (1) natural gas fired boiler, identified as 016, installed in 1988, with a maximum heat input capacity of 14.675 million Btu per hour (MMBtu/hr), exhausting to stack 003.
- (k) One (1) corn-based starch silo, identified as 017, installed in 1999, with a maximum annual capacity for starch throughput of 3,000 tons per year, controlled by a baghouse, and exhausting to stack 004.
- (b) One (1) label laminator, identified as 018, installed in 1994, with no emissions.
- (c) One (1) taper, identified as 019, installed in 2001, with no emissions.
- (d) One (1) small parts washer, identified as 020, installed in 2003, with a maximum usage of less than 0.01 gallons per day, exhausting to the atmosphere.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [40 CFR 124]

Pursuant to 40 CFR 124.15, 40 CFR 124.19, and 40 CFR 124.20, this permit will become effective immediately upon its issuance if no comments requested a change in the draft permit. If a comment is received which requests a change, the effective date of this permit will be thirty (30) days after the service of notice of the decision. If the final day of the thirty (30) day time period falls on a weekend or legal holiday, the time period shall be extended to the next working day.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Local Agency Requirement

An application for an operation permit must be made ninety (90) days before start up to:

City of Indianapolis
Office of Environmental Services (OES)
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The operation permit issued by OES shall contain as a minimum the conditions in the Operation Conditions section of this permit.

B.7 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during

the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The PMP extension notification does not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP’s shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.9 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application shall be certified by an “authorized individual” as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.10 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]
[IC 13-30-3-1]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, or OES, or U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or

emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.11 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and OES, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.12 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or

decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.5 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and OES if the source submits to IDEM, OAQ, and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.6 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.7 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.9 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, and the City of Indianapolis, OES upon request. The CRP shall be prepared

within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements

C.10 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.11 Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the City of Indianapolis, OES on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the City of Indianapolis, OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the City of Indianapolis, OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the City of Indianapolis, OES on or before the date it is due.
- (c) Unless otherwise specified in this permit, any reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]: One (1) paperboard corrugation operation, identified as 001, installed in 1998, with a maximum capacity of seven hundred (700) feet per minute, using a cyclone, identified as 014, as particulate control, and exhausting to stack 002.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations), the allowable particulate emission rate from the paperboard corrugation operation, which is not exempt under 326 IAC 6-3-2(b) or (c), and has a maximum process weight rate of less than 100 pounds per hour, and the methods in 326 IAC 6-3-2 (b) through (d) do not apply, shall not exceed 0.551 pounds per hour.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

- (a) Four (4) specialty folder gluers, identified as 010, 011, 012, and 013, installed in 1989, 1998, 1994, and 2001, respectively, with a collective maximum glue usage of 34.25 pounds per hour, using no controls, and exhausting to the atmosphere.
- (c) One (1) corn-based starch silo, identified as 017, installed in 1999, with a maximum annual capacity for starch throughput of 1,000 tons per year, controlled by a baghouse, and exhausting to stack 004.
- (d) One (1) label laminator, identified as 018, installed in 1994, with no emissions.
- (e) One (1) taper, identified as 019, installed in 2001, with no emissions.
- (f) One (1) small parts washer, identified as 020, installed in 2003, with a maximum usage of less than 0.01 gallons per day, exhausting to the atmosphere.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

There are no applicable conditions for these facilities.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

- (a) One (1) six (6) color flexographic printing press, identified as 002, installed in 1996, with a maximum operating capacity of 8,000 sheets per hour, and exhausting to the atmosphere.
- (b) One (1) two (2) color flexographic printing press, identified as 003, installed in 1989, with a maximum operating capacity of 14,000 sheets per hour, and exhausting to the atmosphere.
- (c) One (1) two (2) color rotary die cutter, identified as 004, installed in 1989, with a maximum operating capacity of 8,000 sheets per hour, using a cyclone, identified as 015, as particulate control, and exhausting to stack 003.
- (d) One (1) two (2) color rotary die cutter, identified as 005, installed in 1991, with a maximum operating capacity of 8,000 sheets per hour, using a cyclone, identified as 015, as particulate control, and exhausting to stack 003.
- (e) One (1) two (2) color rotary die cutter, identified as 006, installed in 1989, with a maximum operating capacity of 6,000 sheets per hour, using a cyclone, identified as 015, as particulate control, and exhausting to stack 003.
- (f) One (1) four (4) color rotary die cutter, identified as 007, installed in 2001, with a maximum operating capacity of 10,800 sheets per hour, using a cyclone, identified as 015, as particulate control, and exhausting to stack 003.
- (g) Two (2) platen die cutters, identified as 008 and 009, installed in 1994 and 2000, respectively, each with a maximum operating capacity of 10,800 sheets per hour, using a cyclone, identified as 015, as particulate control, and exhausting to stack 003.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

There are no applicable conditions for these facilities.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]: One (1) natural gas fired boiler, identified as 016, installed in 1989, with a maximum heat input capacity of 14.675 million Btu per hour (MMBtu/hr), exhausting to stack 003.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.4.1 Particulate Emissions Limitations for Sources of Indirect Heating [326 IAC 6-2]

Pursuant to 326 IAC 6-2-1(d), particulate emissions from indirect heating facilities shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input of boiler.

Therefore, particulate emissions from the natural gas fired boiler shall not exceed 0.54 pounds per million Btu (lbs/MMBtu).

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.4.2 Reporting Requirements

- (a) A certification, signed by the responsible official, that certifies all of the fuels combusted during the period. The natural gas-fired boiler certification does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Inland Paperboard and Packaging, Inc.
Address:	2135 Stout Field East Drive
City:	Indianapolis, Indiana 46202
Phone #:	(317) 390-3300
MSOP #:	097-14600-00314

I hereby certify that Inland Paperboard and Packaging, Inc. is ☒ still in operation.
☐ no longer in operation.

I hereby certify that Inland Paperboard and Packaging, Inc. is ☒ in compliance with the requirements of MSOP 097-14600-00314.
☐ not in compliance with the requirements of MSOP 097-14600-00314.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-5967

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

PAGE 2 OF 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

Addendum to the
Technical Support Document for a Minor Source Operating Permit

Source Name: Inland Paperboard and Packaging, Inc.
Source Location: 2135 Stout Field, Indianapolis, Indiana 46202
County: Marion
SIC Code: 2653
Operation Permit No.: 097-14600-00314
Permit Reviewer: Angelique Oliger

On August 22, 2003, the Office of Air Quality (OAQ) and Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Inland Paperboard and Packaging, Inc. had applied for a Minor Source Operating Permit for the operation of paperboard production. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The following changes, to the draft MSOP, will be made. The TSD will remain as it originally appeared when published. These changes have no effect on the limited potential to emit (PTE) for this source. OES and OAQ prefer that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Upon further review, the OAQ and OES has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Section A.1 (General Information) has been revised to correct the SIC code.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary paperboard production plant.

Authorized Individual: Rick Wheeler
Source Address: 2135 Stout Field, Indianapolis, Indiana 46202
Mailing Address: 2135 Stout Field, Indianapolis, Indiana 46202
General Source Phone: (317) 3903364
SIC Code: ~~2635~~ **2653**
County Location: Marion
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, Section 112 of the Clean Air Act

Not 1 of 28 Source Categories

2. Section A.2 (Source Summary) has been revised to correct the of the purpose of the cyclone, described in items (a), (d), (e), (f), (g), and (h), which is used as a pneumatic conveying device for paper collection, not as particulate control.

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) paperboard corrugation operation, identified as 001, installed in 1998, with a maximum capacity of seven hundred (700) feet per minute, using a cyclone, identified as 014, ~~as particulate control to collect trim paper~~, and exhausting to stack 002.
 - (b) One (1) six (6) color flexographic printing press, identified as 002, installed in 1996, with a maximum operating capacity of 8,000 sheets per hour, and exhausting to the atmosphere.
 - (c) One (1) two (2) color flexographic printing press, identified as 003, installed in 1989, with a maximum operating capacity of 14,000 sheets per hour, and exhausting to the atmosphere.
 - (d) One (1) two (2) color rotary die cutter, identified as 004, installed in 1989, with a maximum operating capacity of 8,000 sheets per hour, using a cyclone, identified as 015, ~~as particulate control to collect trim paper~~, and exhausting to stack 003.
 - (e) One (1) two (2) color rotary die cutter, identified as 005, installed in 1991, with a maximum operating capacity of 8,000 sheets per hour, using a cyclone, identified as 015, ~~as particulate control to collect trim paper~~, and exhausting to stack 003.
 - (f) One (1) two (2) color rotary die cutter, identified as 006, installed in 1989, with a maximum operating capacity of 6,000 sheets per hour, using a cyclone, identified as 015, ~~as particulate control to collect trim paper~~, and exhausting to stack 003.
 - (g) One (1) four (4) color rotary die cutter, identified as 007, installed in 2001, with a maximum operating capacity of 10,800 sheets per hour, using a cyclone, identified as 015, ~~as particulate control to collect trim paper~~, and exhausting to stack 003.
 - (h) Two (2) platen die cutters, identified as 008 and 009, installed in 1994 and 2000, respectively, each with a maximum operating capacity of 10,800 sheets per hour, using a cyclone, identified as 015, ~~as particulate control to collect trim paper~~, and exhausting to stack 003.
2. Section A.2 (Source Summary) has been revised to correct the installation date of the corrugation operation described in item (a).
- (a) One (1) paperboard corrugation operation, identified as 001, installed in ~~1998~~ **1989**, with a maximum capacity of seven hundred (700) feet per minute, using a cyclone, identified as 014, to collect trim paper, and exhausting to stack 002.

3. Section A.2 (Source Summary) has been revised to correct the installation date of the boiler, identified as 016, described in item (j).
 - (j) One (1) natural gas fired boiler, identified as 016, installed in ~~1989~~ **1988**, with a maximum heat input capacity of 14.675 million Btu per hour (MMBtu/hr), exhausting to stack 003.
4. Sections D.4.2 (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) and D.4.3 have been removed. As a result of the correction of the installation date of the boiler, identified as 016, this source is not subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60, Subpart Dc, since operation commenced prior to June 9, 1989. Therefore, the source is also not responsible for record keeping requirements association with to the New Source Performance Standard, 326 IAC 12, 40 CFR 60, Subpart Dc.

~~D.4.2 Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
[326 IAC 12, 40 CFR 60, Subpart Dc]~~

~~Pursuant to the New Source Performance Standard, 326 IAC 12, 40 CFR 60, Subpart Dc:~~

- ~~(a) Daily natural gas consumption for the natural gas fired boiler, 016, with a maximum capacity of 14.675 million Btu per hour (MMBtu/hr) shall be recorded as per 40 CFR Part 60 Subpart Dc. Records shall be retained for a period of at least five (5) years from the date of the generation of the measurement or record.~~
- ~~(b) Pursuant to 40 CFR 60 §60.48c(a), the owner or operator of this source shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this rule. Daily natural gas consumption for the natural gas fired boiler, 016, with a maximum capacity of 14.675 million Btu per hour (MMBtu/hr) shall be recorded as per 40 CFR Part 60 Subpart Dc. Records shall be retained for a period of at least five (5) years from the date of the generation of the measurement or record.~~

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

~~D.4.3 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.4.2, the Permittee shall maintain records in accordance with (1) through (3) below:~~
 - ~~(1) Calendar dates covered in the compliance determination period;~~
 - ~~(2) Actual fuel oil usage since last compliance determination period;~~
 - ~~(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.~~
- ~~(b) All records shall be maintained in accordance with Section C -- General Record Keeping Requirements, of this permit.~~

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: Inland Paperboard and Packaging, Inc.
Source Location: 2135 Stout Field, Indianapolis, Indiana 46202
County: Marion
SIC Code: 2653
Operation Permit No.: 097-14600-00314
Permit Reviewer: Angelique Olinger

The Office of Environmental Services (OES) has reviewed an application from Inland Paperboard and Packaging, Inc. relating to the construction and operation of paperboard production.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units and pollution control devices:

- (a) One (1) paperboard corrugation operation, identified as 001, installed in 1998, with a maximum capacity of seven hundred (700) feet per minute, using a cyclone, identified as 014, as particulate control, and exhausting to stack 002.
- (b) One (1) six (6) color flexographic printing press, identified as 002, installed in 1996, with a maximum operating capacity of 8,000 sheets per hour, and exhausting to the atmosphere.
- (c) One (1) two (2) color flexographic printing press, identified as 003, installed in 1989, with a maximum operating capacity of 14,000 sheets per hour, and exhausting to the atmosphere.
- (d) One (1) two (2) color rotary die cutter, identified as 004, installed in 1989, with a maximum operating capacity of 8,000 sheets per hour, using a cyclone, identified as 015, as particulate control, and exhausting to stack 003.
- (e) One (1) two (2) color rotary die cutter, identified as 005, installed in 1991, with a maximum operating capacity of 8,000 sheets per hour, using a cyclone, identified as 015, as particulate control, and exhausting to stack 003.
- (f) One (1) two (2) color rotary die cutter, identified as 006, installed in 1989, with a maximum operating capacity of 6,000 sheets per hour, using a cyclone, identified as 015, as particulate control, and exhausting to stack 003.
- (g) One (1) four (4) color rotary die cutter, identified as 007, installed in 2001, with a maximum operating capacity of 10,800 sheets per hour, using a cyclone, identified as

015, as particulate control, and exhausting to stack 003.

- (h) Two (2) platen die cutters, identified as 008 and 009, installed in 1994 and 2000, respectively, each with a maximum operating capacity of 10,800 sheets per hour, using a cyclone, identified as 015, as particulate control, and exhausting to stack 003.
- (i) Four (4) specialty folder gluers, identified as 010, 011, 012, and 013, installed in 1989, 1998, 1994, and 2001, respectively, with a collective maximum glue usage of 34.25 pounds per hour, using no controls, and exhausting to the atmosphere.
- (j) One (1) natural gas fired boiler, identified as 016, installed in 1989, with a maximum heat input capacity of 14.675 million Btu per hour (MMBtu/hr), exhausting to stack 003.
- (k) One (1) corn-based starch silo, identified as 017, installed in 1999, with a maximum annual capacity for starch throughput of 1,000 tons per year, controlled by a baghouse, and exhausting to stack 004.
- (l) One (1) label laminator, identified as 018, installed in 1994, with no emissions.
- (m) One (1) taper, identified as 019, installed in 2001, with no emissions.
- (n) One (1) small parts washer, identified as 020, installed in 2003, with a maximum usage of less than 0.01 gallons per day, exhausting to the atmosphere.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP0985362-01, issued on August 26, 1998.

All conditions from previous approvals were incorporated into this permit.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Length x Width (feet)	Flow Rate (acfm)	Temperature (°F)
002	001	55	6	NA	7300	ambient
003	016	37	1	NA	4926	455
004	017	60	1	NA	25	ambient
005	004-007	55	NA	2 x 6	7300	ambient

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on June 19, 2001.

Emission Calculations

See Appendix A (four pages) of this document for detailed emissions calculations

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	75.25
PM-10	75.25
SO ₂	0.04
VOC	29.62
CO	5.40
NO _x	3.21
HAPs	negligible

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of NO_x is greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 emission data submitted by the source to OES with the application.

Pollutant	Potential To Emit (tons/year)
PM	0.672
PM-10	0.672
SO ₂	negligible
VOC	7.168
CO	1.594
NO _x	2.138

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	75.25
PM10	75.25
SO ₂	0.04
VOC	29.62
CO	5.4
NO _x	3.21
Single HAP	negligible
Combination HAPs	negligible

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.
- (b) These emissions are based on the information provided in the source's operating permit application.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) This source is subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60, Subpart Dc, since operation commenced after June 9, 1989 and the maximum design heat input capacity is greater than ten (10) MMBtu/hr but less than one hundred (100) MMBtu/hr.
 - (1) Daily natural gas consumption for the Cleaver Brooks natural gas fired boiler, with a maximum capacity of 10.5 million Btu per hour (MMBtu/hr) shall be recorded as per 40 CFR Part 60 Subpart Dc. Records shall be retained for a period of at least five (5) years from the date of the generation of the measurement or record.
 - (2) Pursuant to 40 CFR 60 §60.48c(a), the owner or operator of this source shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this rule.
- (b) This source is not subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60, Subpart QQ because this source does not use rotogravure printing.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source. Because this source is not a major source of hazardous air pollutants (HAPs), as defined in 40 CFR Part 63.2, 40 CFR Part 63 Subpart KK (National Emissions Standards for the Printing and Publishing Industry) and 40 CFR Part 63 Subpart JJJJ (National Emissions Standard for Paper and Other Web Surface Coating Operations) do not apply to the facility. None of the solvents used by the parts washer permitted by this minor source operating permit contain any of the constituents listed in 40 CFR 63.460(a), therefore 40 CFR 63 Subpart T does not apply.

State Rule Applicability - Entire Source

326 IAC 2-1.1-11 (Compliance Monitoring)

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This source is not a major source. This source is not one (1) of the twenty-eight (28) listed source categories. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.

326 IAC 3 (Monitoring Methods)

Any monitoring or testing shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This source will emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs, and construction occurred before July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per twelve (12) consecutive month period of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period. 326 IAC 1-6

326 IAC 6-1-2 (Nonattainment Area Limitations)

This source has the potential to emit less than one hundred (100) tons per year and has actual emissions of less than ten (10) tons per year of particulate matter. Therefore, 326 IAC 6-1-2 does not apply.

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The natural gas fired boiler, identified as 016, is subject to the provisions of 326 IAC 6-2-1(d) because it is located in Marion County and was constructed after September 21, 1983.

Particulate emissions from indirect heating facilities shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26} = 1.09/14.675^{0.26} = 0.54$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input.

Therefore, particulate emissions from the natural gas fired boiler shall not exceed 0.54 pounds per million Btu (lbs/MMBtu).

326 IAC 7-1 (Sulfur Dioxide Emission Limitations)

This rule does not apply to this source because the potential to emit of each individual unit is less than 25 tons per year or 10 pounds per hour of Sulfur Dioxide.

326 IAC 8-1-6 (New facilities; general reduction requirements)

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****Company Name:** Inland Paperboard and Packaging**Address City IN Zip:** 2135 Stout Field, Indianapolis, Indiana 46202**CP:** 097-14600-00314**Reviewer:** Angelique Oliger**Date:** 17-Jul-03Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

14.7

128.6

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	50.0 *see below	5.5	84.0
Potential Emission in tons/yr	0.5	0.5	0.0	3.2	0.4	5.4

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

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updated 6/00

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
Gas Boiler
HAPs Emissions

updated 6/00
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Company Name: Inland Paperboard and Packaging
Address, City IN Zip: 2135 Stout Field, Indianapolis, Indiana 46202
CP: 097-14600-00314
Reviewer: Angelique Oliger
Date: 37819

AP-43 data given in lb/mmcf: To convert lb/mmcf-lb/mmbtu, divide by 1,020

HAPs - Metals					
	Arsenic	Beryllium	Cadmium	Chromium	Lead
Emission Factor in lb/mmcf	2.0E-04	1.2E-05	1.1E-03	1.4E-03	0.0E+00
Emission Factor in lb/mmBtu	2.0E-07	1.2E-08	1.1E-06	1.4E-06	0.0E+00
Potential Emission in tons/yr	1.26E-05	7.56E-07	6.93E-05	8.82E-05	0.00E+00

HAPs - Metals (continued)					
	Mercury	Manganese	Nickel	Selenium	Total Haps Metals
Emission Factor in lb/mmcf	2.6E-04	3.8E-04	2.1E-03	2.4E-05	
Emission Factor in lb/mmBtu	2.5E-07	3.7E-07	2.1E-06	2.4E-08	
Potential Emission in tons/yr	1.64E-05	2.39E-05	1.32E-04	1.51E-06	3.74E-04

HAPs - Organics					
	Methylnaphthalene	3-Methylchloranthrene	7,12-Dimethylbenz(a)anthracene	Acenaphthene	Acenaphthylene
Emission Factor in lb/mmcf	2.4E-05	1.8E-06	1.6E-06	1.8E-06	1.8E-06
Emission Factor in lb/mmBtu	2.4E-08	1.8E-09	1.6E-09	1.8E-09	1.8E-09
Potential Emission in tons/yr	1.51E-06	1.13E-07	1.01E-07	1.13E-07	1.13E-07

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HAPs - Organics(continued)					
	Anthracene	Benz(a)anthracene	Benzene	Benzo(a)pyrene	Benzo(b)fluoranthene
Emission Factor in lb/mmcf	2.4E-06	1.8E-06	2.1E-03	1.2E-06	1.8E-06
Emission Factor in lb/mmBtu	2.4E-09	1.8E-09	2.1E-06	1.2E-09	1.8E-09
Potential Emission in tons/yr	1.51E-07	1.13E-07	1.32E-04	7.56E-08	1.13E-07

HAPs - Organics(continued)					
	Benzo(g,h,i)perylene	Benzo(k)fluoranthene	Chrysene	Dibenzo(a,h)anthracene	Dichlorobenzene
Emission Factor in lb/mmcf	1.2E-06	1.8E-06	1.8E-06	1.2E-06	1.2E-03
Emission Factor in lb/mmBtu	1.2E-09	1.8E-09	1.8E-09	1.2E-09	1.2E-06
Potential Emission in tons/yr	7.56E-08	1.13E-07	1.13E-07	7.56E-08	7.56E-05

HAPs - Organics(continued)					
	Fluoranthene	Fluorene	Formaldehyde	Hexane	Indeno(1,2,3-cd)pyrene
Emission Factor in lb/mmcf	3.0E-06	2.8E-06	7.5E-06	1.8E+00	1.8E-06
Emission Factor in lb/mmBtu	2.9E-09	2.7E-09	7.4E-09	1.8E-03	1.8E-09
Potential Emission in tons/yr	1.89E-07	1.76E-07	4.73E-07	1.13E-01	1.13E-07

HAPs - Organics(continued)				
	Naphthalene	Phenanthrene	Total Haps Organics	Total Haps Combined
Emission Factor in lb/mmcf	6.1E-04	1.7E-05		
Emission Factor in lb/mmBtu	6.0E-07	1.7E-08		
Potential Emission in tons/yr	3.84E-05	1.07E-06	1.14E-01	1.14E-01

Methodology

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

VOC Potential Emissions Calculations for Printing Operations

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Emission Units 002 - 009

Company Name: Inland Paperboard and Packaging
Address City IN Zip: 2135 Stout Field, Indianapolis, Indiana 46202
Reviewer: Angelique Olinger
Date: July 10, 2003

Hours of Operation in 2002: 4285

Coating Description	Amount Purchased in 2002 (lbs)	VOC Content % by weight	VOC Emissions (tons in 2002)	Potential VOC Emissions (tons/yr)*
Process Blue	7100	1.14	0.04	0.08
Reflex Blue	1800	1.57	0.01	0.03
SPX Dispenser GS Cyan	4840	0.67	0.02	0.03
SPX Dispenser Reflex	640	0.51	0.00	0.00
Black	1350	1.37	0.01	0.02
SPX Dispenser Black	16	0.89	0.00	0.00
Orange	854	4.32	0.02	0.04
SPX Dispenser Orange	716	1.16	0.00	0.01
SPX Dispenser Green	1164	0.51	0.00	0.01
Purple	1590	3.26	0.03	0.05
Lt Fast Purple	40	0	0.00	0.00
SPX Dispenser Violet	1650	0.07	0.00	0.00
Hydro 50 Iron Oxide Red	135	1.34	0.00	0.00
YS Magenta	1111	0	0.00	0.00
SPX Dispenser naphthol	2434	0.35	0.00	0.01
SPX Dispenser Lithol	495	0.51	0.00	0.00
SPX Dispenser Rhodamine	320	0.51	0.00	0.00
SPX Dispenser Rubine	1611	0.05	0.00	0.00
YS Red	3228	0.27	0.00	0.01
Calcium Lithol	950	4.14	0.02	0.04
White	11950	1.15	0.07	0.14
SPX Dispenser White	2090	0.05	0.00	0.00
Process Yellow	11080	4.07	0.23	0.46
Opaque Yellow	180	1.28	0.00	0.00
SPX Dispenser Yellow	2043	1.14	0.01	0.02
SPX-V Process Cyan KL	1981	5.26	0.05	0.11
HG Reflex U Blue St	975	1.21	0.01	0.01
HG Lr Reflex Blue U Mk	1035	2.29	0.01	0.02
SPX-V Reflex C Blue KL	845	2.54	0.01	0.02
Hydro GCMi 90 Black	18045	2.42	0.22	0.45
Hydro High Den 6 Black	520	0.81	0.00	0.00
Hi Density Blending Black	2000	2.28	0.02	0.05
SPX - V Process Black KL	902	5.26	0.02	0.05
HG Dense Black	7615	1.19	0.05	0.09
WB E 32143 811U Flo Org	878	6.94	0.03	0.06
HG W25124 Shinx Gold Mk	376	3.55	0.01	0.01
HG PMS 872U Gold MK	118	3	0.00	0.00
SPX - V Glaceau Pink KL	83	2.54	0.00	0.00
SPX - DGF Extender	17143	1.1	0.09	0.19
SPX-V Extender	11100	6	0.33	0.68
TR Filled Extender	1245	1.51	0.01	0.02
Filled Extender	54400	0.97	0.26	0.54
G.R. Coating	113	0.46	0.00	0.00
Hydro SPX-DGF EXT	41	1.1	0.00	0.00
Hydro SPX-DS EXT	40	8.77	0.00	0.00
SPX Special Extender	27628	4.48	0.62	1.27
SPX OPV	36375	2.96	0.54	1.10
SB Anti-skid Cor Coating	264	0.52	0.00	0.00
Hydro SPX-V3 Extender	315	0.58	0.00	0.00
WB Anti-skid Cor Coating	552	0.22	0.00	0.00
WB Anti-skid Cor Coating	425	0.22	0.00	0.00
WB W25043 877 Silver BK	460	10.85	0.02	0.05
SPX-V Glaceau Purple KL	80	5.63	0.00	0.00
HG PMS 485U Red MK	5213	1.52	0.04	0.08
SPX-DGF Proc Magenta KL	822	4.92	0.02	0.04
PE E31601 805U Red St	1079	6.39	0.03	0.07
SPX-V R26886 Kraft Red KL	399	1.97	0.00	0.01
HG PMS 186C Red MK	1230	0.38	0.00	0.00
Cascade White	1110	0.27	0.00	0.00
SPX-V Process Yellow KL	2906	5.48	0.08	0.16
HG NR Tristar Yellow MK	180	5.15	0.00	0.01
HG PMS 116U Yellow St	1800	1.13	0.01	0.02
PE Glaceau Yellow KL	214	7.47	0.01	0.02
HK-Thickener	76	69	0.03	0.05
H-50 Wax Compound	1657	5.37	0.04	0.09
Slow Dry	790	0	0.00	0.00
Hydro Max Gloss OPV	120	3	0.00	0.00
Hydro Max Gloss OPV	900	3	0.01	0.03
Skid Resistant Coating	1695	0	0.00	0.00
E-4 Wax Emulsion	1350	0	0.00	0.00
PE Special Extender B	45	6.54	0.00	0.00
CRI PH Equalizer	9645	30.62	1.48	3.02
Defoamer F32	280	100	0.14	0.29
Flexo 06S2070 Retarder	700	100	0.35	0.72
Flexo 06S2070 Retarder	480	100	0.24	0.49
Flexo 06S2070 Retarder	3360	100	1.68	3.43
Hydro UV Indicator	45	0	0.00	0.00
SPX - V Defoamer	906	0	0.00	0.00
Total	281943		6.97	14.26

Emissions Calculations of Corrugator

- *The weight of the product (board) is 0.14 pounds square foot.
- *The maximum potential line speed of the corrugator is 700 feet per minute.
- *The maximum potential web width of the corrugator is 7.25 feet.
- *0.5 percent of waste is dust.
- *Collection efficiency of cyclone is 99%.
- *The trim lost at the corrugator is 8%.

Potential Production Calculation:

$$0.14 \text{ lbs} / \text{ft}^2 * 700 \text{ ft} / \text{min} * 7.25 \text{ feet} * 1 \text{ ton} / 2000 \text{ lbs} * 60 \text{ min} / \text{hr} * 8760 \text{ hr} / \text{year} = 186,719 \text{ tons board} / \text{year}$$

Particulate Potential Emission Calculations:

Potential trim to cyclone from corrugator:

$$186,719 \text{ tons board} / \text{year} * 8 \text{ tons waste} / 100 \text{ tons board} * 0.5 \text{ tons dust} / 100 \text{ tons waste} = \mathbf{74.69 \text{ tons PM} / \text{year before controls}}$$

Emissions Calculations of Gluers

- *The maximum amount of glue used is 34.25 pounds per hour.
- *The glue contains 10% VOCs by weight.

VOC Potential Emission Calculations:

$$34.25 \text{ lbs glue} / \text{hr} * 10 \text{ lbs VOC} / 100 \text{ lbs glue} * 1 \text{ ton} / 2000 \text{ lbs} * 8760 \text{ hr} / \text{year} = \mathbf{15 \text{ tons VOC} / \text{year}}$$

Emissions Calculations of Starch Silo

- *These calculations are based on theoretical continuous filling.
- *The maximum annual starch usage is 3,000 tons starch per year.
- *The starch truck capacity is 47,500 pounds per load.
- *The truck unloading time is 0.75 hours.
- *The starch unloading emissions factor is 0.00049 (AP-42, Table 9.9.7-1).

Particulate Potential Emission Calculations:

$$47,500 \text{ lbs / load} / (0.75 \text{ hours per load}) * 8760 \text{ hours / year} * 1 \text{ ton} / 2000 \text{ lbs} = \\ 277,400 \text{ tons starch / year}$$

$$277,400 \text{ tons starch / year} * 0.00049 \text{ lbs PM} / 1 \text{ ton starch} * 1 \text{ ton} / 2000 \text{ lbs} = \\ \mathbf{0.068 \text{ tons PM / year}}$$

Emissions Calculations of Parts Washer

- *The maximum amount of parts washing solvent used is 0.01 gallons per day.
- *The density of the solvent is 6.54 pounds per gallon.
- *The solvent is 100% VOC.

VOC Potential Emission Calculations:

$$0.01 \text{ gallons solvent / day} * 6.54 \text{ lbs / gallon} * 365 \text{ days / year} * 1 \text{ ton} / 2000 \text{ lbs} = \\ \mathbf{0.012 \text{ tons VOC / year}}$$

Summary of Sourcewide Potential Emissions

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Company Name: Inland Paperboard and Packaging
Address City IN Zip: 2135 Stout Field, Indianapolis, Indiana 46202
Reviewer: Angelique Oliger
Date: July 10, 2003

Emissions Unit	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
001	74.69	74.69				
002 - 009					14.26	
010 - 013					15.00	
016	0.49	0.49	0.04	3.21	0.35	5.40
017	0.07	0.07				
020					0.01	
Total	75.25	75.25	0.04	3.21	29.62	5.40